

Classified  
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U.S. EPA  
11-16-87

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Richard Ross, Ph.D.  
Oneill Hill, Inc.  
Box 22530  
Denver, Colorado 80222

Dear Mr. Ross,

Enclosed are the U.S. Environmental Protection Agency's (EPA) comments in the preliminary draft Baxter Springs Remedial Investigation Work Plan. The comments should be incorporated and a draft work plan submitted to EPA by November 30, 1987. The Agency needs eight bound copies and one unbound copy of the plan.

Sincerely yours

Alice C. Fuerst  
Remedial Section  
Superfund Branch  
Hazard Management Division

Enclosure

cc: Howard Andrews, DAW (w/enclosure)

cc: Administrative Record, 3 copies (w/enclosure)

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## General Comments

1. The work plan should be for the complete remedial investigation in the Baxter Springs subsite. The title should not be "Phase I" because there will not be a Phase II. Our experience in the Baxter Subsite can be used to plan an adequate investigation. The objective of the investigation is to add to the existing data base in order to have adequate information to understand the site problem and undertake a feasibility study. A change is needed through the plan to reflect this.
2. Page 1-1, para. 1 - UK Lanoma and Region VI have completed its investigation of the Oklahoma portion of the Tri-State District. Therefore, the third line should be revised to reflect this fact. The last sentence pertaining to the Missouri side should be removed. The EPA cannot discuss the Missouri portion at this time.
3. Page 1-3 through 1-5 - The summary of the UK conclusions should not be included in this work plan.
4. Page 1-6, last paragraph - Since the discussion refers to the right samples collected during the reconnaissance, a table showing those results should be included.
5. Page 1-8, Objectives - The purpose of the investigation is to add to the current data base in order to obtain adequate information to identify the problems and to evaluate potential remedial alternatives. The objectives as stated in the report should be revised.
6. Page 2-1, paragraph 2 - The objective of the Baxter Springs RI is to add to the existing data base for characterizing the subsite and assessing the effects of past lead-zinc mining activities.
7. Page 2-2, paragraph 2-a) - Since the Agency has not proposed a new PCB for lead, the work plan should not discuss the possibility of a proposal. The proposed rule is 20  $\mu\text{g}/\text{l}$ . It is advisable to use a detection limit of 10  $\mu\text{g}/\text{l}$  to adequately evaluate potential health concerns. b) In the DAPP, the detection limits should be specified. If detection limits are needed to be lower than the 10  $\mu\text{g}/\text{l}$  limits, then that should be specified.
8. Page 2-2, paragraph 4 - Do not refer to letters for the detection limits. Put a table in the work plan that shows the limits tested.
9. Page 2-3, paragraph 1 - Do not just state that the detection limits will be similar to those set for the TPCR. An analysis performed at a lab test. The work plan should also include a table to tell what those limits are.

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- 9. Page 3-1, paragraph 2 - CH2M Hill has data stating that metals are in the ground water and surface water; therefore, do not state that heavy metals may be dissolved in the water.
  - 10. Page 3-2, first full paragraph - SRK completed a ground water use survey in the Baxter Springs subsite and found no families using the shallow ground water. The first sentence should be revised.
  - 11. Page 3-3, paragraph 1 - As stated above, the ground water use survey located nobody using the shallow aquifer.
  - 12. Page 4-1, Total Project Management - The cost detail sheets show four people on this task. The site manager should perform this activity, although he is not included in this task. I assume that entry was coded incorrectly. Too many hours have been estimated for this task, 84 hours a month is excessive and should be reduced. Since B&W is not included in this task, they should not receive funds for travel, etc., and should not receive a fee.
  - 13. Page 4-5, Quality Control - The description of quality control does not match the task detail cost estimate and they should.
  - 14. Page 4-7, Task 4.5.4 - There is only a Field Operations Plan not a "Phase 1 Field Operations Plan".
  - 15. Page 4-8, Task 4.5.7 - This paragraph states that the tasks include reviewing and correcting sample related paper work. The Agency does not want to pay for the contractor making a mistake and then correct it. Let us do it right the first time.
  - 16. Page 4-8, Task 4.5.8 - The agency has already paid for the existing data to be collected and compiled. The surface water and ground water technical memorandum states that it does not need to be done again.
  - 17. Page 4-10, Well Inventory - The Agency has already paid for a inventory of wells in the subsite. The last will search their titles for additional wells. The whole subtask should be removed.
  - 18. Page 4-11, paragraph 1 - Since EPA has not talked to Baxter Springs about using their well, they should not be noted in the report.
  - 19. Page 4-11, para 2 - The site-wide water supply inventory did not include three wells to be used. A correction is needed.
  - 20. Page 4-12, Ground Water Monitoring - The MTC has reservations about the ground water monitoring plan but at this time will not require a change to the scope.

21. Page 4-12, paragraph 2 - Do burns, tree plant work plan (figure) shows the locations of the three samples in the southeast corner of the site.
22. Page 4-12, paragraph 2 - Do not refer to a field reconnaissance memorandum. The document has not been issued.
23. Page 4-14, Biological monitoring - The EPA has completed all the biological monitoring it is going to do. Remove this section from the text.
24. Page 4-15, Community relations - The community relations work will not necessarily be sub-site-specific, therefore, revise the first sentence. The activities *may* include the list in the work plan, not "will include". A change is necessary.
25. Page 4-16, Report - The explanation should be revised since a Phase II is not planned. Revision will add five bound copies of the report and one unbound copy.
26. Page 5-1, Schedule - Obviously, the schedule must be changed. The draft work plan should be sent to EPA by November 30, 1981. Following completion of the final work plan, expect three to four weeks for approval of the plan by EPA Headquarters.
27. Task detail, field work - Since EPA is doing the field work, tasks will not need eight trips to the site. Too much of EPA time is scheduled for the field. Currently, there are 23 days of field time scheduled.